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Attorneys for Defendant

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

REARDEN LLC, REARDEN MOVA LLC,

Plaintiffs,

v.

WALT DISNEY PICTURES, a California
 corporation,

Defendant.

Case No. 4:17-cv-04006-JST

**JOINT STIPULATION AND
 [PROPOSED] ORDER PURSUANT TO
 ECF NOS. 540, 542**

1 Plaintiffs Rearden LLC and Rearden MOVA LLC (“Plaintiffs”) and Defendant Walt Disney
2 Pictures (“Defendant”), by and through their counsel of record, hereby stipulate as follows:

3 1. WHEREAS, on October 18, 2023, the Court issued an Order Granting Defendant’s
4 Motion to Exclude Portions of Philip Fier’s Testimony (“Fier Order”), ECF No. 539;

5 2. WHEREAS, on October 18, 2023, the Court issued an Order Denying Plaintiffs’
6 Motion to Exclude Portions of Dr. Stephen Lane’s Testimony (“Lane Order”), ECF No. 541;

7 3. WHEREAS, the Court temporarily restricted public access to both the Fier Order and
8 the Lane Order, and directed the parties to file for each order, within one week of its issuance, either
9 (1) a stipulated proposed redacted version, or (2) a stipulation that the parties agree that no redaction
10 is necessary, ECF Nos. 540, 542;

11 4. WHEREAS, Plaintiffs and Defendant have conferred and request that the Court enter
12 the attached proposed redacted version of the Fier Order, which redacts only one portion of the order
13 that contains material the Court has already ordered sealed at ECF No. 456;

14 5. WHEREAS, Plaintiffs and Defendant have conferred and agree that no redaction of
15 the Lane Order is necessary;

16 6. NOW THEREFORE, the Parties stipulate that there is good cause to (1) enter the
17 proposed redacted version of the Fier Order; and (2) allow full access by the public to the unredacted
18 Lane Order at ECF No. 541.

19 7. Electronic signatures are sufficient to execute this stipulation.

20 DATED: October 24, 2023 HAGENS BERMAN SOBOL SHAPIRO LLP

21 By: /s/ Mark S. Carlson
22 MARK S. CARLSON
23 *Attorneys for Plaintiffs*

24 DATED: October 24, 2023 MUNGER, TOLLES & OLSON LLP

25 By: /s/ Kelly M. Klaus
26 KELLY M. KLAUS
27 *Attorneys for Defendant*

CIVIL LOCAL RULE 5-1 ATTESTATION

I, Kelly Klaus, am the ECF user whose credentials were utilized in the electronic filing of this document. In accordance with Civil Local Rule 5-1(i)(3), I hereby attest that Mark Carlson concurred in the filing of this document.

/s/ Kelly M. Klaus

Kelly M. Klaus

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

October 25, 2023, 2023



The Honorable Jon S. Tigar
United States District Judge